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10 NORMAN KRASNER

11
12 UNITED STATES DISTRICT COURT
13 SOUTHERN DISTRICT OF CALIFORNIA
14 SAN DIEGO DIVISION
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16 GABRIEL TECHNOLOGIES
CORPORATION and TRACE
17 TECHNOLOGIES, LLC,

18 Plaintiffs,

19 v.

20 QUALCOMM INCORPORATED,
SNAPTRACK, INC. and NORMAN
21 KRASNER,

22 Defendants.
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Case No. 08-cv-1992 AJB MDD

**DEFENDANTS QUALCOMM,
INCORPORATED, SNAPTRACK INC., AND
NORMAN KRASNER'S NOTICE OF
MOTION AND MOTION FOR AN ORDER TO
FILE DOCUMENTS UNDER SEAL**

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on August 10, 2012, Defendants Qualcomm Incorporated, SnapTrack, Inc., and Norman Krasner (collectively “Defendants”) will and hereby do move the Court for an Order to Submit Certain Documents Under Seal. Specifically, Defendants seek permission to file under seal exhibits 1, 2, 3, and 4 of the Declaration of Timothy S. Teter in Support of the motion to exclude Plaintiffs’ purported expert witnesses. The exhibits in question are copies of the experts reports submitted by Plaintiffs as well as excerpts from the deposition transcripts of Plaintiffs’ experts. The exhibits have been designated by Plaintiffs as confidential pursuant to the protective order. In addition, Defendants seek permission to seal the portions of the motion to exclude Plaintiffs’ experts that disclose the content of the confidential exhibits. As the exhibits have been designated as Confidential, pursuant to Paragraph 13 of the Protective Order, Defendants seek an order permitting them to file the exhibits and accompanying references in the brief under seal.

This Motion is based on this Notice of Motion and Motion, the accompanying Memorandum of Points and Authorities, all records and papers on file in this action, and any evidence or oral argument offered at any hearing on this Motion.

Dated: August 10, 2012

COOLEY LLP

/s/ Jeffrey S. Karr

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